

RECEIVED ROOM

Before the
Federal Communications Commission
Washington, D.C. 20554

RECEIVED

In the Matter of)	WT Docket No. 98-143
1998 Biennial Regulatory Review --)	RM-9148
Amendment of Part 97 of the Commission's)	RM-9150
Amateur Service Rules)	RM-9196
)	
)	

COMMENTS OF

Paul J. Kiesel, P.O Box 112, Tahuya, WA 98588.

I file these comments on November 13, 1998 in the FCC's Notice of Proposed rule Making WT Docket 98-183.

I. INTRODUCTION

My name is Paul J. Kiesel. My FCC-issued callsign is K7CW. In February, 1999 I will celebrate my fortieth anniversary of being a licensed radio amateur. My license class is Amateur Extra, and I will have been in possession of that class of license for thirty years in that same year. I have a baccalaureate degree in Science from the University of Washington. I have published two articles on antennas in magazines of international distribution. I have been very active on amateur radio frequencies since I was issued my first amateur radio license, in 1959. I have a forty word-per-minute Morse code receiving proficiency certificate. Because of the above background, I feel that I am knowledgeable enough to comment in an informed manner about the FCC proposals.

II. SUMMARY

I am commenting on some points brought up by the FCC in WT Docket 98-183 - these being:

- (1) Reduction in the number of Amateur Service licenses (administrative cost saving)
- (2) The Amateur Service morse code requirement (for keeping the high standard)
- (3) Enforcement of the Amateur Service rules (for stability of the Amateur Service)
- (4) Elimination of RACES station licenses (a cost saving measure)
- (5) Vanity licenses (a cost saving measure)

No. of Copies rec'd
List ABCDE

049

(6) Issuance of permanent licenses (a cost saving measure)

III. DISCUSSION

1. I believe some streamlining could be done in the area of reduction in the number of classes of licenses in the Amateur Radio Service. I think that a total of three (3) licenses in the Amateur Radio Service should suffice. I would call these license classes "General", "Advanced", and "Amateur Extra." I think there should be some meaning in the names of licenses. It is for that reason that I discourage the use of "Class A", "Class B," etc. I believe the licenses should be structured as follows:

- a. General Class. Beginning level license. Conveys all privileges now authorized present General Class licensees with the exception that the maximum authorized output power from the transmitter will be 100 watts.
- b. Advanced Class. Intermediate level license. Conveys all privileges now authorized present Advanced Class licensees.
- c. Amateur Extra Class. Highest class license. Conveys all privileges now authorized present Amateur Extra Class licensees.

All present holders of Novice, Technician and Technician Plus licenses would be grandfathered into the new General Class. All present holders of General and Advance Class licenses would be grandfathered into or retained in the Advanced Class.

2. Because of the inevitability that the international morse code requirement for amateur licensees will eventually be dropped, I would concur that the morse code requirement needs to be changed. New General Class licensees should have to pass *sending and receiving* tests in morse code at a speed of five (5) words-per-minute. Advanced Class licensees should have to pass *sending and receiving* tests in morse code at a speed of ten (10) words-per-minute. Amateur Extra Class licensees should have to pass *sending and receiving* tests in morse code at a speed of twenty (20) words-per-minute. When the international morse code requirement is eventually dropped, I would favor elimination of a morse code requirement for General and Advanced Class licensees, and I would favor a *retention* of a morse code requirement for holders of the Amateur Extra Class license with a drop in the required speed to ten (10) words-per-minute. I firmly believe that it is very important to keep the morse code alive in amateur radio. Morse code has been a part of amateur radio since the beginning. Morse code is as basic as ohms law. It is still very useful as a major mode of communications. Moreover, it is still a *highly-desired* mode of choice for many amateurs. I don't believe morse code should be used as a filter to "keep out undesireables," but as one means to keep an amateur radio license a "desireable thing to strive for." With respect to credit being granted for prior passing of morse code tests, I believe it should be granted in all cases, even if it were for tests

taken to obtain licenses which have expired. I don't believe credit should be given to examinees who don't pass the morse code test. I believe that if you can't (or don't or won't) pass a test, you shouldn't be granted the same privileges as those who do. There is plenty of amateur spectrum for those who haven't passed a morse code test. There is nothing "unfair" about not granting a license to someone who hasn't earned it. This is a privilege, not a right. Besides being other things, amateur radio is a sport. It would be unfair to other "champions" to include as one of them a person who has never won a race. It was a big mistake to grant medical dispensations in the first place.

3. I believe enforcement of amateur radio regulations should remain with the Federal Government, (the FCC). While I recognize that Congress has made it very difficult for the Commission to carry out enforcement activities because of manpower problems, I still think it necessary for the FCC to maintain an "enforcement arm" to be "out there" for correction of difficult problems. I also think that, if the FCC relinquishes enforcement powers to the private sector, that real enforcement of the rules will disappear and be replaced by messy civil actions which will ultimately result in the demise of amateur radio as we know it. The Amateur Auxiliary should continue to be used extensively, acting in close cooperation with the "FCC's enforcement arm." We amateurs who have been "around for a while" are glad to have had the FCC there for enforcement of the rules. I would have it no other way. And, I wouldn't mind paying a license fee to have it.

4. RACES Station Licenses should not be renewed. We never needed them in the first place.

5. Regarding vanity licenses. I think the Commission should have issuing windows for vanity licenses. For instance, a window could be open, say, every fifth year. Moreover, if the vanity call sign were to be issued as permanent for a one-time fee, this would eliminate the need to maintain vanity call sign databases.

6. Permanent licenses. I believe all holders of Amateur Extra Class licenses should be granted permanent station and operator licenses. This would also relieve some administrative labor.

IV. CONCLUSION

While I understand that the FCC is under great pressure from Congress to "streamline" where-ever it can in the interest of cost-saving, it occurs to me that there is a reasonable limit to this. Also, it is true that times *are* changing. I would love to have Amateur Radio be just like it used to be back when I got my first license, in 1959. At the same time, I admit that I love much of this new technology appearing day after day.

It is regretable that Federal cutbacks are taking such a toll on the proper functions of government. But a mandate is a mandate. So I ask that the Commission do its utmost to ensure the

continuance of Amateur Radio. This means to keep it an appealing avocation, but it also means to keep it high quality so that amateurs will always want to be amateurs and so that non-hams will want to become hams. I hate to see the FCC losing so many people that it can't maintain its functions, enforcement, for instance.

Back in the old days, it was a real EVENT to go down and take the exam in front of the FCC examiner with all eyes watching. This was important for me at the age of fourteen and it would still be for all aspiring amateurs today, if it were still possible to do it that way. But, alas, streamlining must go on. The FCC and the Amateur Radio Service should be close partners. I hope we can keep it that way.

While some of my suggestions, above, are probably not what you are looking for, I felt that I had to give a little and stay firm a little, too. I hope you all are able to make maximum use of my comments. This matter is so important that I sat down and put this together.

A handwritten signature in cursive script, reading "Paul J. Kiesel".

Paul J. Kiesel, K7CW
P.O. Box 112
Tahuya, WA 98588-0112

DOCUMENT OFF-LINE

This page has been substituted for one of the following:

- o An oversize page or document (such as a map) which was too large to be scanned into the RIPS system.
- ✓ o Microfilm, microform, certain photographs or videotape.
- o Other materials which, for one reason or another, could not be scanned into the RIPS system.

The actual document, page(s) or materials may be reviewed by contacting an Information Technician. Please note the applicable docket or rulemaking number, document type and any other relevant information about the document in order to ensure speedy retrieval by the Information Technician.

DISKETTE